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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 In re  
12 HELLER EHRMAN LLP,  
13 Debtor.

Chapter: 11  
Case No.: 08-32514

14  
15 HELLER EHRMAN LLP,<sup>1/</sup>  
16 Debtor In Possession,

Adversary Proceeding No: 09-3225

17 vs.

**STIPULATION FOR BINDING  
MANDATORY FEE ARBITRATION AND  
FOR RELIEF FROM STAY**

18 BETTER ENERGY SYSTEMS LTD., an  
19 unregistered foreign corporation; BETTER  
20 ENERGY SYSTEMS LLC, a California  
21 Limited Liability Company; BETTER  
22 ENERGY SYSTEMS, INC., a Delaware  
23 Corporation; and DOES 1 to 10, inclusive,  
24 Defendants.

25 1. On February 4, 2010, defendants Better Energy Systems Ltd., Better  
26 Energy Systems LLC, and Better Energy Systems, Inc. filed a Client's Request for  
27 Resolution of a Fee Dispute with the Bar Association of San Francisco ("BASF"),  
28 indicating that the arbitration was for advisory purposes only.

<sup>1/</sup> Federal Tax I.D. No. XX-XXX-7308; 333 Bush Street , San Francisco, CA 94104  
Firm File No. 8375

2. Heller Ehrman LLP and defendants have since agreed that the BASF arbitration shall be binding.

3. BASF is concerned that the bankruptcy stay precludes it from proceeding with the arbitration. Heller Ehrman LLP hereby stipulates to relief from the bankruptcy stay in order to, and to the extent necessary, to permit this binding arbitration to proceed to conclusion, provided however, that Better Energy Systems LLC shall have no right to receive any actual monetary recovery of any kind absent further order of the Bankruptcy Court.

Dated: March 26, 2010

ADLER LAW FIRM

By: 

Joel D. Adler  
Special Collection Counsel for HELLER  
EHRMAN LLP, Debtor in Possession

Dated: March 26, 2010

HELLER EHRMAN LLP, a California Limited  
Liability Partnership (Debtor In Possession)

By: 

Shelly Salinero, Its Authorized Representative

Dated: March 25, 2010

DHILLON & SMITH LLP

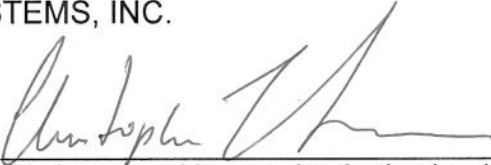
By: 

Harold P. Smith  
Attorneys for Defendants BETTER ENERGY  
SYSTEMS, LTD., BETTER ENERGY  
SYSTEMS LLC and BETTER ENERGY  
SYSTEMS, INC.

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Dated: February 17, 2010

BETTER ENERGY SYSTEMS, LTD., BETTER  
ENERGY SYSTEMS LLC and BETTER ENERGY  
SYSTEMS, INC.

By: 

Christopher Hornor, Its Authorized  
Representative